

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION and  
THE PEOPLE OF THE STATE OF NEW  
YORK, by LETITIA JAMES, Attorney  
General of the State of New York,

Plaintiffs,

v.

QUINCY BIOSCIENCE HOLDING  
COMPANY, INC., a corporation;

QUINCY BIOSCIENCE, LLC, a limited  
liability company;

PREVAGEN, INC., a corporation  
d/b/a/ SUGAR RIVER SUPPLEMENTS;

QUINCY BIOSCIENCE  
MANUFACTURING, LLC, a limited  
liability company; and

MARK UNDERWOOD, individually and as  
an officer of QUINCY BIOSCIENCE  
HOLDING COMPANY, INC., QUINCY  
BIOSCIENCE, LLC, and PREVAGEN,  
INC.,

Defendants.

Case No. 1:17-cv-00124-LLS

**DECLARATION OF EDWARD  
GLENNON IN SUPPORT OF  
PLAINTIFFS' REPLY IN SUPPORT  
OF THEIR MOTION TO EXCLUDE  
THE TESTIMONY OF DRS. DAVID  
SCHWARTZ, DAVID KATZ, LEE-  
JEN WEI, MINDY KURZER,  
RICHARD GOODMAN, AND DAVID  
GORTLER**

**DECLARATION OF EDWARD GLENNON**

I, Edward Glennon, declare as follows:

1. I am an attorney for the Federal Trade Commission in the above-captioned litigation against Corporate Defendants Quincy Bioscience Holding Company, Inc., Quincy Bioscience, LLC, Prevagen, Inc., and Quincy Bioscience Manufacturing, LLC, and Individual Defendant Mark Underwood. I submit this declaration in support of Plaintiffs' Reply in Support of their Motion to Exclude the Testimony of Drs. David Schwartz, David Katz, Lee-Jen Wei, Mindy Kurzer, Richard Goodman, and David Gortler, filed on October 21, 2022.

2. Attached as **Exhibit A** is a true and correct copy of excerpts from the transcript of the September 22, 2021 deposition of David Schwartz, Ph.D. in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 21, 2022

/s/ Edward Glennon  
Edward Glennon

**CERTIFICATE OF SERVICE**

I certify that on this 21<sup>st</sup> day of October 2022, I caused service of the foregoing Declaration of Edward Glennon in Support of Plaintiffs' Reply in Support of their Motion to Exclude the Testimony of Drs. David Schwartz, David Katz, Lee-Jen Wei, Mindy Kurzer, Richard Goodman, and David Gortler to be made by electronic filing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

Dated: October 21, 2022

/s/ Annette Soberats

Annette Soberats

Federal Trade Commission